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Counsel for Debtors and Debtors in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:)	
)	
EASY STREET HOLDING, LLC, <i>et al.</i> ,)	Bankruptcy Case No. 09-29905
)	Jointly Administered with Cases
Debtors.)	09-29907 and 09-29908
)	
Address: 201 Heber Avenue)	Chapter 11
Park City, UT 84060)	
)	Honorable R. Kimball Mosier
Tax ID Numbers:)	
35-2183713 (Easy Street Holding, LLC),)	
20-4502979 (Easy Street Partners, LLC), and)	[FILED ELECTRONICALLY]
84-1685764 (Easy Street Mezzanine, LLC))	

**DEBTOR'S EX PARTE MOTION TO APPROVE NOTICE OF
OBJECTION DEADLINE ON MOTION FOR ORDER ESTABLISHING
MONTHLY FEE AND EXPENSE REIMBURSEMENT PROCEDURES**

Easy Street Partners, LLC, Easy Street Holding, LLC, and Easy Street Mezzanine, LLC
(together, the “Debtors”), debtors in possession, hereby submit their ex parte motion (the
“Ex Parte Motion”) for an Order approving the time for notice of objection deadline on the motion

for Order Establishing Monthly Fee and Expense Reimbursement Procedures (the “Motion”), so that notice sent on Wednesday, November 25, 2009, of an objection deadline of Thursday, December 10, 2009, is sufficient. In support of this Ex Parte Motion, the Debtor states as follows:

1. Partners commenced this case under Chapter 11 of the United States Bankruptcy Code by filing a voluntary petition on September 14, 2009.

2. The Motion has been vetted with, and drafts of the Motion have been reviewed by, counsel for WestLB, AG (“WestLB”) and the Official Unsecured Creditors Committee (the “Committee”). The Motion is closely tied to cash collateral issues and the Joint Motion of the Debtors and WestLB to Approve Amendments to Stipulation Authorizing Use of Cash Collateral Pursuant to 11 U.S.C. § 363 and Granting Adequate Protection is scheduled to be heard at the same time that the Motion is scheduled for hearing.

3. Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure authorizes the Court, in its discretion, to reduce the period for notice “for cause shown.”

4. The Debtors believe that their notice of hearing on the Motion, which is 19 days, complies with the Court’s local rules and that no reduction of time is necessary. The Debtors believe that it is important that objections to the Motion, if any, are filed sufficiently in advance of the hearing on the Motion that the Court and parties in interest have the opportunity fully to review the objections. Although it is not clear that the fifteen-day notice given of the deadline to object to the Motion requires a shortening of time, the Debtors, from an abundance of caution, request that the Court approve such notice of the time to object to the Motion. The Motion requests approval of important relief to professionals in the case. The circumstances of the Motion

and the time-sensitivity of the matter to the Debtors and estate professionals constitute “cause” for approving the objection notice period.

Accordingly, for cause shown, the Debtor requests that the Court approve notice of the time for objections to the Motion so that notice served by mail and ECF on Wednesday, November 25, 2009, of an objection deadline of Thursday, December 10, 2009, is sufficient.

DATED this 25th day of November, 2009.

DURHAM JONES & PINEGAR

By: /s/ Kenneth L. Cannon II

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